

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA | : | CASE NO. 3:16cr-044 |
| v. | : | Judge Walter Herbert Rice |
| JAMES L. WRIGHT, | : | |
| Defendant. | : | |

PROTECTIVE ORDER

Upon consideration of the United States' Unopposed Motion for Protective Order, it is hereby ORDERED that:

1. For purposes of this Protective Order, “Confidential Information” refers to documents or other materials that contain personally identifiable information of individuals other than the defendant, including, but not limited to, social security numbers, telephone numbers, home addresses, bank account numbers, and other tax and financial information.
2. Confidential Information disclosed by the government to the defendant and/or his counsel during the course of proceedings in this action, including pursuant to the government’s discovery obligations:
 - a. Shall be used by the defendant and/or his counsel solely for purposes of this criminal action;
 - b. Shall not be disclosed in any form by the defendant and/or his counsel to members of the media or used for any commercial or business purpose;
 - c. Shall not be disclosed in any form by the defendant and/or his counsel except as

set forth in paragraph 3 below.

3. Confidential Information may be disclosed by the defendant and/or his counsel only to the following designated persons: (i) all personnel employed or retained by the defendant's counsel; (ii) independent expert witnesses or advisors retained, pursuant to a written retainer agreement, by the defendant and/or his counsel in connection with the criminal case; (iii) prospective witnesses, and their counsel, to the extent deemed necessary by defense counsel, for trial preparation; and (iv) such other persons as hereafter may be authorized by the Government or by order issued by any Court. Confidential Information may not remain in the custody of prospective witnesses or the defendant.

4. The defendant and/or his counsel shall provide a copy of this order to the designated persons to whom they disclose Confidential Information pursuant to subparagraphs 2(i)-(iv). Designated persons shall be subject to the terms of this order. The defendant and/or his counsel shall maintain a record of all such persons who have received Confidential Information.

5. Defense counsel shall store Confidential Information in a secure place and shall use reasonable care to ensure that the Confidential Information is not disclosed or disseminated to any third parties in violation of this order. In the event of an inadvertent disclosure of Confidential Information, the defendant and/or his counsel shall promptly notify the Court and the Government as to the identity of the recipient of the inadvertently produced Confidential Information and shall use all reasonable efforts to secure the return or destruction of the inadvertently produced Confidential Information.

6. The provisions of this order shall not be construed as preventing the disclosure of

any information in any motion, hearing, trial held in this action, any appeal therefrom, or to any Judge or Magistrate Judge of this Court or the Court of Appeals for purposes of this action.

7. The defendant and/or his counsel will abide by the restrictions set forth in this order unless the defendant and/or his counsel makes a written request to the Government for an exception to these restrictions, and such request is granted. The Government shall make all reasonable efforts to accommodate such exceptions. If such exceptions are refused, the defendant and/or his counsel may seek relief from the Court.

SO ORDERED:

A handwritten signature in black ink, appearing to read 'Walter H. Rice', is written over a horizontal line.

WALTER H. RICE
UNITED STATES DISTRICT COURT JUDGE